

Response of Hero Arts Rubber Stamps Inc.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF
DELAWARE

In re:
JOANN, Inc., et al.,
Post-Effective Date Debtors.
Chapter 11
Case No. 25-10068 (CTG)
D.I. 1839 (filed November 11, 2025)
(Jointly Administered)

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CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Response of Hero Arts Rubber Stamps Inc. to GUC Trust's Third Omnibus
(Non-Substantive) Objection to Certain Claims (Late-Filed Claims)

Hero Arts Rubber Stamps Inc ("Claimant"), appearing pro se, submits this Response to
the GUC Trust's Third Omnibus (Non-Substantive) Objection to Certain Claims
(Late-Filed Claims) (the "Objection") and respectfully states as follows:

I. IDENTIFICATION OF CLAIM

- Claimant: Hero Arts Rubber Stamps Inc
- Claim No.: 12400
- Debtor: JOANN Inc.
- Basis: Trade vendor claim for goods delivered prepetition

The Objection seeks to disallow Claim No. 12400 solely as "late-filed."

II. SUMMARY OF RESPONSE

Although Kroll received Claim No. 12400 on April 7, 2025, the Claimant timely shipped
the proof-of-claim package on April 2, 2025, via UPS Next Day Air. Delivery was delayed
solely due to severe weather conditions documented by UPS. Claimant acted diligently
and in good faith. Under Bankruptcy Rule 9006(b)(1) and Pioneer Investment Services
Co. v. Brunswick Associates, 507 U.S. 380 (1993), the Court should deem the claim
timely filed based on excusable neglect.

III. ARGUMENT

A. The Pioneer Excusable Neglect Standard Applies

Rule 9006(b)(1) permits late filings when the failure to comply results from "excusable

neglect.” Pioneer establishes four equitable factors:

- (1) danger of prejudice to the debtor or trust;
- (2) length of delay and impact on proceedings;
- (3) reason for delay and whether it was within the reasonable control of the movant;
- (4) good faith.

B. Claimant Satisfies All Pioneer Factors

1. No Prejudice

The GUC Trust identifies no prejudice. Allowing this claim poses no disruption to case administration.

2. Minimal Delay

The delay was one business day (received Monday following a Friday bar date). Courts routinely excuse significantly longer delays.

3. Delay Was Solely Due to UPS, Outside Claimant's Control

Claimant shipped the claim via UPS Next Day Air on April 2, 2025. UPS confirms severe weather caused exception scans on April 3 and 4, preventing timely delivery. Claimant reasonably relied on guaranteed overnight service.

4. Good Faith

Claimant acted early, used expedited service, and at all times intended timely compliance.

C. Equity Strongly Favors Allowing the Claim

The Trust acknowledges that late-filed claimants may seek relief. This Response seeks exactly that relief. The equities overwhelmingly favor deeming Claim No. 12400 timely. Claimant did everything a reasonable creditor could have done to ensure timely delivery.

IV. CONCLUSION

Claimant respectfully requests that the Court:

- (1) Overrule the Objection as to Claim No. 12400;
- (2) Deem Claim No. 12400 timely filed under Bankruptcy Rule 9006(b)(1) and Pioneer;
- (3) Grant any further relief deemed just and proper.

V. DECLARATION OF CLAIMANT

I, the undersigned, declare under 28 U.S.C. § 1746:

1. I caused the Proof of Claim for Claim No. 12400 to be shipped via UPS Next Day Air on April 2, 2025.
2. UPS guaranteed overnight delivery and provided an expected delivery date of April 3,

2025.

3. UPS later confirmed the shipment was delayed due to severe weather on April 3 and 4, 2025.

4. Delivery occurred April 7, 2025, solely due to UPS delay, not any lack of diligence by Claimant.

5. I acted in good faith at all times.

Executed on December 1, 2025.

/s/ Aaron Leventhal

Authorized Representative

Hero Arts Rubber Stamps Inc (Pro Se)

Aaron Leventhal

Hero Arts Rubber Stamps, Inc. (Claim No. 12400)

DBA Open Hand Manufacturing, Inc.

744 Pomona Ave

Albany, CA 94706

aaron@openhandmfg.com

510-918-0310

Exhibit 1 – Original UPS Shipping Record (Next Day Air Saver)

Embedded below is the original UPS shipping label showing:

- UPS Next Day Air Saver service
- 4/2/2025 shipment date
- Delivery address to Kroll
- Tracking number 1Z5W213F1380305558
- 4/7/2025, receipt stamp by Kroll

This exhibit demonstrates that the Claimant shipped the Proof of Claim two days before the Bar Date using guaranteed overnight delivery.

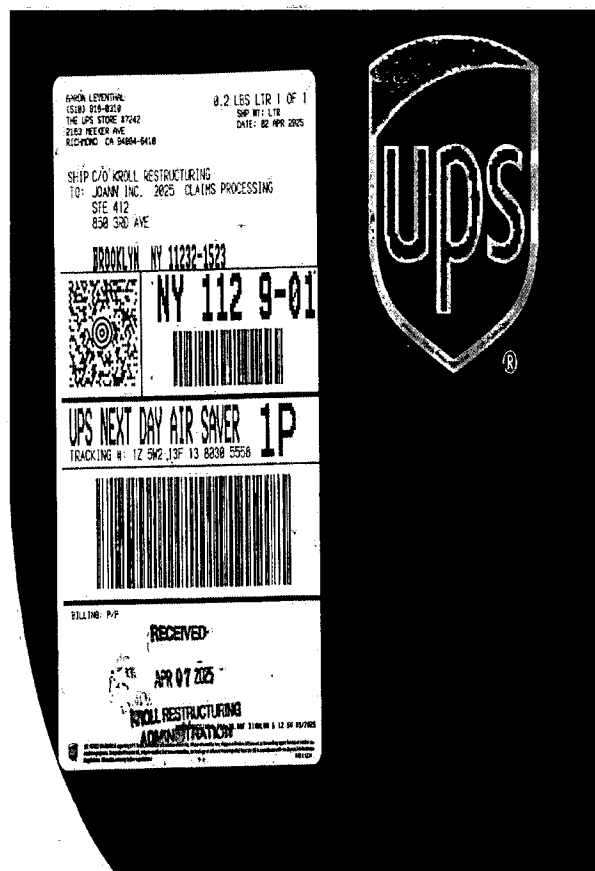


Exhibit 2 – UPS Tracking Exception Email (Weather Delay)

Screenshot of the UPS email confirming weather delay, showing:

- Expected Arrival date was 4/3/2025.
- Exceptions due to bad weather prevented delivery.
- Weather prevented deliveries on both 4/3/2025 and 4/4/2025.
- UPS states it was not delivered on time

C-0335073502 - [ref:!00DF005wsA.!500e70KGHW6:ref]



External (Inbox x)



noreply_cs@ups.com <noreply_cs@ups.com>
to me ▾

12:02 PM (0 minutes ago) ☆ ↶ ⋮



Dear Aaron

I hope this message finds you well. I wanted to reach out regarding your package **1Z5W213F1380305558** the case # **C-0335073502** to give the reason of the delay of this shipment the system shows an exception scans happened on **4/3/25** and **4/4/25** as there was a severe weather conditions delayed the package from being delivered on time we completely apologize for that inconvenience.

If you have any questions or need assistance with your shipment, please don't hesitate to contact us at **[1-800-377-4877]** **Mon to Fri: 7AM to Midnight ET Sat: 7:30AM to 6PM ET.** We are happy to help ensure your delivery experience goes smoothly.

Thank you for choosing UPS — we truly appreciate your trust in our service.

Warm regards,

[Mohamed Azab]

UPS Preferred Customer Associate
1-800-377-4877

ref:!00DF005wsA.!500e70KGHW6:ref

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CERTIFICATE OF SERVICE

I certify that on December 1, 2025, a true and correct copy of the following document:

- Response of Hero Arts Rubber Stamps Inc. to GUC Trust's Third Omnibus (Non-Substantive) Objection to Certain Claims (Late-Filed Claims)

was served via UPS Next Day Air Saver as follows:

BY UPS NEXT DAY AIR SAVER

Clerk of the Court

United States Bankruptcy Court for the District of Delaware

824 North Market Street, 3rd Floor

Wilmington, DE 19801

Office of the United States Trustee

Attn: Timothy Jay Fox, Jr.

844 King Street, Suite 2207

Wilmington, DE 19801

Email (courtesy): timothy.fox@usdoj.gov

Counsel to the GUC Trust, including:

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Attn: Eric R. Wilson / Maeghan J. McLoughlin / Charles J. Fendrych

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175 Greenwich Street

New York, NY 10007

Benesch, Friedlander, Coplan & Aronoff LLP

Attn: Jennifer R. Hoover / Steven L. Walsh

1313 N. Market Street, Suite 1201

Wilmington, DE 19801

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on December 1, 2025.

/s/ Aaron Leventhal

Aaron Leventhal

Authorized Representative

Hero Arts Rubber Stamps Inc (Pro Se)

744 Pomona Ave

Albany, CA 94706

aaron@openhandmfg.com

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